

**OFFICE OF THE SECRETARY
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
JOINT INTERROGATORIES TO STAMPS.COM WITNESS HESELTON
(ABA&NAPM/STAMPS.COM-T1-1-3)
(June 19, 2000)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit these joint interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third

party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

ABA&NAPM/STAMPS.COM-T1- 1 In your testimony you repeatedly observe that IBI mail is prepared to automation compatible standards. Do you not, therefore, agree that mail that has been automated via an MLOCr would have all of the costs avoidance features you attribute to IBI prepared mail? If you do not agree, please state each and every reason you have for disagreeing and identify specifically which cost avoidance features automated mail (mail that has had a CASS/MASS certified 11-digit delivery point barcode applied to it) would not have that IBI prepared mail has.

ABA&NAPM/STAMPS.COM-T1- 2 Do you agree that automated mail processed with *FASTforward* would have addresses that are as current and accurate and deliverable as IBI prepared mail. If you do not agree please state precisely why automated mail processed with *FASTforward* would not have as current and deliverable address as IBI prepared mail.

ABA&NAPM/STAMPS.COM-T1- 3 Why do you assume on page 16 lines 20-22 that most of the deficiencies in the third line, the city/state/ZIP Code line, would "be detected at image lift" and would not require returning the piece to the sender?

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

By:  _____

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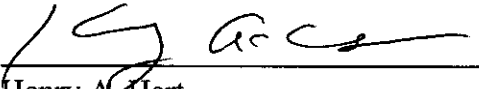
Date: June 19, 2000
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

June 19, 2000